

ORIGINAL

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 22 2008

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SUE BEITIA, CLERK

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Attorneys for Plaintiff  
JEANNE K. ENDO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO, ) CIVIL NO. 03-00563 LEK  
)  
Plaintiff, ) PLAINTIFF'S FINAL COMPREHENSIVE  
) WITNESS LIST; CERTIFICATE OF  
v. ) SERVICE  
)  
UNITED PUBLIC WORKERS, AFSCME )  
LOCAL 646, AFL-CIO, )  
)  
Defendant. )  
UNITED PUBLIC WORKERS, )  
AFSCME LOCAL 646, AFL-CIO, )  
)  
Third-Party Plaintiff, )  
)  
v. )  
)  
GARY W. RODRIGUES, )  
)  
Third-Party Defendant. ) TRIAL DATE: May 13, 2008

**PLAINTIFF'S FINAL COMPREHENSIVE WITNESS LIST**

Plaintiff Jeanne K. Endo, by and through her counsel, hereby  
submits her Final Comprehensive Witness List.

**A. Nonexperts**

1. Jeanne K. Endo, c/o The Law Office of Clayton C. Ikei, 1440 Kapiolani Boulevard, Suite 1203, Honolulu, Hawaii 96813. Ms. Endo is the Plaintiff in this action and is expected to testify as to the factual allegations in the pleadings and damages incurred. Estimated time: 3 hours.

2. Dayton Nakanelua, c/o Charles A. Price, Esq., 2600 Pauahi Tower, 1001 Bishop Street, Honolulu, Hawaii 96813. Mr. Nakanelua is the UPW's State Director and is expected to testify as to the factual allegations in the pleadings, including, Plaintiff's competence, and Diann C. Berndt's sexual harassment incident. Additionally, Attorney Robert F. Miller's involvement in having Mr. Nakanelua sign an affidavit with false statements about Plaintiff. Estimated time: 2 hours.

3. George Yasumoto, 1524 Pensacola Street, Room 315, Honolulu, Hawaii 96822. Mr. Yasumoto is a former UPW Board Secretary/Treasurer and is expected to testify as to the factual allegations of the pleadings, including defamation of Plaintiff's character, the powerless, need-to-know Board, the continual wrongdoings that was condoned by the Board. Mr. Yasumoto is also expected to testify as to his observations of Plaintiff and the talks he and Plaintiff had regarding her hostile work environment. Additionally, the extent of control Rodrigues had over the Board. Estimated time: 2 hours.

4. Georgetta (Carroll) Chock, 3543-A McCorriston Street, Honolulu, Hawaii 96815. Ms. Chock is a former UPW employee and is expected to testify as to the factual allegations in the pleadings, including her sexual harassment experience with Rodrigues, and how he had other affairs when she was living with him. Estimated time: 2 hours.

5. Alison Leong, c/o Charles A. Price, Esq., 2600 Pauahi Tower, 1001 Bishop Street, Honolulu, Hawaii 96813. Ms. Leong is a UPW Private Sector Vice President and is expected to testify as to defamation of Plaintiff's character, the powerless, need-to-know board, and the continual wrongdoings that was condoned by the Board. Additionally, the extent of control Rodrigues had over the Board. Estimated Time: 1 hour.

6. Lillian Chun, 3647 Sunset Place, Honolulu, Hawaii 96816. Ms. Chun is a UPW Retiree Counselor and is expected to testify as to the factual allegations in the pleadings, including her observations of Plaintiff, and the allegations of sexual harassment. Estimated time: 1 hour.

7. Traci (Satogata) Higa, 14 Akamau Place, Honolulu, Hawaii 96817. Ms. Higa is a former UPW Accountant and is expected to testify as to the factual allegations in the pleadings, including her observance of how Rodrigues treated Merlene Akau and Plaintiff in 1996 and how Rodrigues would undermine Plaintiff. Estimated time: 1 hour.

8. Aurora Fernandez, c/o Charles A. Price, Esq., 2600 Pauahi Tower, 1001 Bishop Street, Honolulu, Hawaii 96813. Ms. Fernandez is a UPW Administrative Assistant and is expected to testify as to the factual allegations in the pleadings, including her knowledge of a co-worker (Farias) that confided in her regarding Rodrigues' sexually harassing the co-worker and Rodrigues' attitude towards women. Estimated time: 1 hour.

9. Masayoshi Kobayashi, Tensho Kotai Jingu Kyo, 888 N. King Street, Honolulu, Hawaii 96817. Mr. Kobayashi is Plaintiff's Clergyman and is expected to testify as to the factual allegations in the pleadings and damages, including Plaintiff's character and his discussions with Plaintiff regarding her hostile work environment. Estimated time: 1 hour.

10. Clifford "Chip" Uwaine, 98-1366 Koahehe Place, Room 196, Pearl City, Hawaii 96782. Mr. Uwaine is a UPW employee and is expected to testify as to the factual allegations in the pleadings, including a document that was supposed to be published in the Union's newspaper, Malama Pono, to discredit Plaintiff. Estimated time: 1 hour.

11. Nancy Endo, 99-735 A Kealaluina Drive, Aiea, Hawaii 96701. Ms. Endo is Plaintiff's cousin and is expected to testify as to the factual allegations in the pleadings and damages, including Plaintiff's character and her conversations with

Plaintiff regarding Plaintiff's hostile work environment.

Estimated time: 1 hour.

12. Avis Morigawara, 98-476 Pono Street, Aiea, Hawaii 96701. Ms. Morigawara is a member of Plaintiff's church and is expected to testify as to the factual allegations in the pleadings and damages, including Plaintiff's character and the conversations she had with Plaintiff regarding Plaintiff's hostile work environment. Estimated time: 1 hour.

Plaintiff reserves the right to name additional witnesses identified by any other party.

**B. Expert Witnesses**

1. Rosalie Tatsuguchi, Ph.D., 3221 Waialae Avenue, Room 378. Dr. Tatsuguchi is Plaintiff's treating therapist and is expected to testify as to Plaintiff's condition and the treatment thereof. Estimated time: 2 hours.

DATED: Honolulu, Hawaii, April 22, 2008.



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CLAYTON C. IKEI  
JERRY P.S. CHANG

Attorneys for Plaintiff  
JEANNE K. ENDO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JEANNE K. ENDO,	)	CIVIL NO. 03-00563 LEK
	)	
Plaintiff,	)	CERTIFICATE OF SERVICE
	)	
v.	)	
	)	
UNITED PUBLIC WORKERS, AFSCME	)	
LOCAL 646, AFL-CIO,	)	
	)	
Defendant.	)	
<hr/>	)	
	)	
UNITED PUBLIC WORKERS,	)	
AFSCME LOCAL 646, AFL-CIO,	)	
	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
GARY W. RODRIGUES,	)	
	)	
Third-Party Defendant.	)	
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was duly served upon the following parties at their last known address via U.S. Mail, postage prepaid, on April 22, 2008:

TO: ERIC A. SEITZ, ESQ.  
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Defendant Gary W. Rodrigues

AND

JAMES E.T. KOSHIBA, ESQ.  
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Attorneys for Defendant  
UPW, AFSCME, LOCAL 646, AFL-CIO

DATED: Honolulu, Hawaii, April 22, 2008.



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CLAYTON C. IKEI  
JERRY P.S. CHANG

Attorneys for Plaintiff  
JEANNE K. ENDO